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By CM/ECF

The Honorable Ona T. Wang
United States District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

**Re: In re Application of Sukhbaatar Batbold For an Order Pursuant to
28 U.S.C. § 1782,
21-mc-00218-RA (S.D.N.Y.)**

Dear Judge Wang:

We represent K2 Integrity (referred to in the caption as K2 Intelligence a/k/a K2 Integrity) (“K2”), the target of the proposed subpoenas in the above matter.

We respectfully submit this letter motion to request an extension of the time to file K2’s opposition to Mr. Batbold’s application from April 23, 2021 (ECF No. 27) to May 3, 2021. Mr. Batbold’s application attaches declarations from attorneys in five jurisdictions: England, Hong Kong, Singapore, Jersey, and Mongolia. ECF Nos. 17–21. K2 requests this extension because it needs more time than initially expected to gather information from these five jurisdictions in response to Mr. Batbold’s application. This includes the unusual and time-consuming task of translating documents back and forth from Mongolian. This is K2’s first request for an extension of this deadline. We will, of course, agree to any reasonable adjustment that Mr. Batbold requests to his time to reply. We have asked Mr. Batbold’s counsel for their position on this request but have not yet heard back from them.

Respectfully submitted,

/s/ Aron Fischer

Aron Fischer

cc: All counsel of record (via ECF)